

**IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF GEORGIA  
VALDOSTA DIVISION**

UNITED STATES OF AMERICA	§	
	§	
<b>-versus-</b>	§	
	§	<b>CASE NO.: 7:23-CR-00072</b>
TERESA PAULO,	§	
	§	
<i>Defendant.</i>	§	

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**PAULO’S MOTION TO TRAVEL OUTSIDE THE DISTRICT**

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**COMES NOW** the above-named Defendant, **TERESA PAULO** (hereinafter “Paulo”), by and through her undersigned counsel, and files this, her **Motion to Travel Outside the District** by stating as follows:

**-1-**

In or about 2020, Mrs. **PAULO** was approached by law enforcement agents regarding this matter and her role therein. She promptly cooperated with agents and eventually was formally debriefed.

**-2-**

On November 2, 2023, Mrs. **PAULO** pled guilty to a two-count information – aggravated identity theft and bank fraud.

**-3-**

Sentencing in this matter is scheduled for July 11, 2024 before this Honorable Court.

-4-

Mrs. **PAULO** is 59 years old and was born with Ventricular Septal Defect (VSD) commonly known as a hole in her heart. In 1978, she underwent surgery to repair the defect.

-5-

In 2000, Mrs. **PAULO** was diagnosed with congestive heart failure and fitted with a pacemaker. On or about November 22, 2023, she was hospitalized for heart surgery to replace her pacemaker.

-6-

Since November 2023, Mrs. **PAULO** has had some heart complications and has not “felt her best.” In fact, after experiencing difficulties with her pacemaker, Mrs. **PAULO** was promptly returned to Emory University Hospital on May 7, 2024.

-7-

As a result of the issues Mrs. **PAULO** has experienced with her heart and pacemaker, her son (Dillon) has requested that she comes to Hartford, Connecticut so that he can observe her for a couple of weeks and seek the advice of physicians in the Hartford area prior to the July 11, 2024 sentencing date in this matter.

-8-

Furthermore, Mrs. **PAULO**’s son (Dillon) graduates from his residency program at the University of Connecticut on June 20, 2024. Such a milestone is an endeavor that any parent would be proud of and want to witness and attend.

-9-

At this time, Mrs. **PAULO** respectfully requests this Honorable Court's permission to travel to Harford, Connecticut on or before June 9, 2024 to spend time with her son and allow him the opportunity to observe her condition and seek additional medical advice or attention; and to allow her to attend her son graduation.

-10-

Counsel spoke with the Government concerning this matter and while the Government was not opposed to Mrs. **PAULO** spending a few days with her son for purposes of attending his graduation, the Government is hesitant to agree for a two-week stay.

-11-

As Probation has set forth in the PSR, Mrs. **PAULO** self-surrendered to the U.S Marshals Service in Albany, Georgia on October 26, 2023 and was released on a \$10,000.00 unsecured bond with conditions. "Pretrial services records indicate that she [**PAULO**] has complied will all Court ordered conditions of release." [Doc. #16, Para. 8]. In fact, it is counsel's understanding that Mrs. **PAULO** has timely reported each of her travels outside of Lowndes County, Georgia to probation, even travels that did not require her to report.

-12-

If this Honorable Court approved of Mrs. **PAULO**'s request, she will fly to Hartford on June 9, 2024 and reside with her son (Dillon) until June 21, 2024, at which time she and her husband would drive back to Valdosta.

**WHEREFORE**, Defendant **TERESA PAULO** respectfully requests that this Honorable Court inquire into this matter and grant the same.

**Respectfully submitted**, this 5th day of June, 2024.

**COPELAND, HAUGABROOK & WALKER**

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*/s/ Nathaniel Haugabrook, II*

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NATHANIEL HAUGABROOK, II

Georgia Bar No. 3337970

**Attorney for PAULO**

### **CERTIFICATE OF SERVICE**

I hereby certify that on 5 June 2024, I electronically filed the foregoing **PAULO'S MOTION TO TRAVEL OUTSIDE THE DISTRICT** with the Clerk of Court using the CM/ECF system which will send notification of such to all counsel of record.

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